



**U.S. Department of Justice  
Consumer Protection Branch**

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February 8, 2017

**BY ECF FILING**

Hon. Nicholas G. Garaufis  
United States District Court  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, New York 11201

Re: *United States v. BDK Mailing, GmbH, et al.*, No. 1:16-cv-05264-NGG-RER

Dear Judge Garaufis,

We represent the United States and defendants Mail Order Solutions India Pvt. Ltd., Dharti B. Desai, and Mehul A. Desai (collectively, the "MOSI Defendants") in the action referenced above. With the consent of all parties, we write to jointly request (i) that the Court enter the attached Stipulated Preliminary Injunction (Exhibit A) and (ii) extend the deadline for the MOSI Defendants to respond to the United States' Complaint by 60 days to allow additional time for the parties to continue negotiating a final settlement of the United States' claims.

The Court has granted five prior consent motions by one or more of the parties for the extension of time for defendants to answer or respond to the complaint (Dkt. #19, 34, 36, 43, 46). With the consent of all parties, we respectfully request that the Court extend the deadline for the MOSI Defendants to answer or respond to the United States' Complaint by 60 days from February 17, 2017 until **April 18, 2017**. This is the same date by which all non-moving defendants must answer or respond to the United States' Complaint. This Joint Motion also obviates the need for the Court's February 22, 2017 preliminary injunction hearing, which we respectfully ask that the Court cancel upon entry of the Stipulated Preliminary Injunction. A proposed Revised Scheduling Order is attached (Exhibit B).

We thank the Court in advance for its consideration.

Very Truly Yours,

/s/ Gabriel H. Scannapieco  
Gabriel H. Scannapieco  
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/s/ *Thomas Price*

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Mehul A. Desai*

cc: Robert J. Anello, Nicholas M. De Feis, Vera M. Kachnowski, Curtis B. Leitner, Judith Mogul, Phillip C. Patterson, Silvia L. Serpe